

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

**IN RE:**

**MARTIN J WOOLBERT**

**Debtor**

**BK. No. 16-18406 AMC**

**Chapter No. 13**

**WILMINGTON SAVINGS FUND SOCIETY,  
FSB, D/B/A CHRISTIANA TRUST, NOT  
INDIVIDUALLY BUT AS TRUSTEE FOR  
PREMIUM MORTGAGE ACQUISITION  
TRUST**

**:**  
**:**  
**:**  
**:**  
**11 U.S.C. §362 and 1301**

**Movant**

**:**

**v.**

**:**

**MARTIN J WOOLBERT**

**SUSAN WOOLBERT (Non-Filing Co-Debtor)**

**Respondents**

**:**

**:**

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

**WILMINGTON SAVINGS FUND SOCIETY, FSB, D/B/A CHRISTIANA TRUST, NOT INDIVIDUALLY BUT AS TRUSTEE FOR PREMIUM MORTGAGE ACQUISITION TRUST** has filed a Motion for Relief from the Automatic Stay with the Court to permit **WILMINGTON SAVINGS FUND SOCIETY, FSB, D/B/A CHRISTIANA TRUST, NOT INDIVIDUALLY BUT AS TRUSTEE FOR PREMIUM MORTGAGE ACQUISITION TRUST** to Foreclose on **520 DEERFIELD DRIVE, NORRISTOWN, PENNSYLVANIA 19403**.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the Court to grant relief sought in the motion or if you want the Court to consider your views on the motion, then on or before August 16, 2017 you or your attorney must do all of the following:

(a) file an answer explaining your position at:

Clerk's Office, U.S. Bankruptcy Court  
The Robert Nix Building  
900 Market Street  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

PHELAN HALLINAN DIAMOND & JONES, LLP  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable ASHELY M. CHAN on August 29, 2017 at 11:00 AM, in Courtroom 5, United States Bankruptcy Court, The Robert Nix Building, 900 Market Street, Philadelphia, PA 19107. Unless the Court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorneys named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

August 1, 2017